

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MASSACHUSETTS**

CIVIL ACTION NO.: 04-11625 RWZ

JOAN CHARLES,
Plaintiff,
v.

OCWEN FEDERAL BANK, OCWEN FINANCIAL
CORPORATION, MASSACHUSETTS PROPERTY
INSURANCE UNDERWRITING ASSOCIATION
and ONE CALL INSURANCE AGENCY, INC.,
Defendants,

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**ANSWER OF DEFENDANT MASSACHUSETTS
PROPERTY INSURANCE UNDERWRITING ASSOCIATION TO
CROSS-CLAIM OF OCWEN FEDERAL BANK FSB AND
OCWEN FINANCIAL CORPORATION**

1. Defendant can neither admit nor deny and therefore denies and calls upon Plaintiff to prove the same.
2. Admit.
3. Defendant can neither admit nor deny and therefore denies and calls upon Plaintiff to prove the same.
4. Defendant repeats answers to paragraphs 1 through 3.
5. Deny.
6. Defendant repeats answers to paragraphs 1 through 5. .
7. No response necessary. Defendant denies.

**CROSS – CLAIM OF MASSACHUSETTS PROPERTY INSURANCE UNDERWRITING
ASSOCIATION AGAINST OCWEN FEDERAL BANK, F.S.B. AND OCWEN FINANCIAL
CORPORATION**

1. The Defendant/Plaintiff-in-Cross – Claim Massachusetts Property Insurance Underwriting Association (hereinafter “MPIUA”) is an association established pursuant to Massachusetts General Laws, c. 1 § 75 with a principal place of business at Two Center Plaza, Boston, Massachusetts.

2. MPIUA denies liability to the Plaintiff. However, if MPIUA is liable to the Plaintiff, then it is entitled to contribution from Ocwen Federal Bank FSB and Ocwen Financial Corporation, in accordance with Massachusetts General Laws, c. 231B §1 et seq.

WHEREFORE, MPIUA respectfully requests that judgment enter in its favor on its Cross – Claim against Ocwen Federal Bank F.S.B. and Ocwen Financial Corporation including costs and attorney's fees.

Respectfully submitted,
By my attorney,

/s/ Michael W. Reilly

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JURY DEMAND: Now comes the Defendant and demands a jury trial on all issues.

Michael W. Reilly, Esq.